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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OWEN DIAZ,
Plaintiff,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
Defendant.

Case No. 3:17-cv-06748-WHO

**PLAINTIFF'S PROPOSED REVISED
INSTRUCTION NO. 32**

Trial Date: March 27, 2023
Complaint filed: October 16, 2017

No. 32**RETURN OF VERDICT**

A verdict form has been prepared for you. The verdict form asks you to designate the amounts of “past” and “future” non-economic damages that Owen Diaz sustained as a result of Tesla, Inc’s unlawful conduct. Mr. Diaz’s “past” non-economic damages are those he sustained before October 2021, when the first phase of this two-phase proceeding was conducted. Mr. Diaz’s “future” non-economic damages are those he sustained or will sustain after that date. After you have reached unanimous agreement on a verdict, your foreperson should complete the verdict form according to your deliberations, sign and date it, and advise the clerk that you are ready to return to the courtroom.

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DATED: March 29, 2023



Attorney for Plaintiff
OWEN DIAZ